

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WYONIA COX,

Plaintiff,

v.

ACTION FINANCIAL SERVICES, LLC,

Defendant.

Case No. 2:20-cv-10260-GAD-DRG

Honorable Judge Gershwin A. Drain

MOTION TO WITHDRAW AS COUNSEL

NOW COME Counsel for Plaintiff, Mohammed O. Badwan and Ahmad T. Sulaiman of the Sulaiman Law Group, Ltd., and Ameena R. Sheikh of Rippy Sheikh Law Firm PC (collectively, “Plaintiff’s Counsel”), hereby moving this Honorable Court for leave to withdraw as counsel for Wyonia Cox (“Plaintiff”), and in support thereof, stating as follows:

1. On January 31, 2020, Plaintiff filed a putative class action against Defendant Action Financial Services, LLC (“Defendant”) seeking redress for violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.*, and the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. 227 *et seq.* [Dkt. 1]
2. On November 24, 2020, Plaintiff filed an amended complaint. [Dkt. 23]
3. The parties are in the process of completing discovery.
4. Defendant has issued multiple notices of deposition to Plaintiff.
5. Plaintiff’s Counsel have made numerous unsuccessful attempts to contact Plaintiff through phone calls and written correspondences.
6. Despite Plaintiff’s Counsel’s numerous attempts to contact Plaintiff, Plaintiff has been unresponsive.

7. On March 8, 2021 and March 18, 2021, Plaintiff's Counsel mailed written correspondences to Plaintiff's last known address informing Plaintiff of their intent to withdraw as her counsel.

8. To date, Plaintiff has not contacted Plaintiff's Counsel.

9. Plaintiff's Counsel cannot effectively represent Plaintiff without Plaintiff's active participation in this case.

10. For the foregoing reasons, Plaintiff's Counsel submit that there is good cause for the Court to permit Plaintiff's Counsel to withdraw as counsel for Plaintiff.

11. In the event the Court would like to contact Plaintiff, Plaintiff's last known address is 1404 W. Grand, Detroit, Michigan 48208. Furthermore, Plaintiff's last known phone number is (313) 443-5300.

WHEREFORE, Plaintiff's Counsel respectfully request that this Court enter an Order granting the Motion to Withdraw as counsel for Plaintiff Wyonia Cox, and for any other relief the Court deems just and appropriate.

Respectfully submitted,

/s/ Mohammed O. Badwan
Mohammed O. Badwan
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CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, certify that on March 24, 2021, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Mohammed O. Badwan